

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

December 5, 1996

Mr. Steven Kinser
EPA, Region VII
Superfund Division
726 Minnesota Ave.
Kansas City, KS 66101

7ES
Site: Westlake Landfill
ID # MBD079900932
Break: 10.9 OU2
Other: Comments
12-5-96
0774

RECEIVED
DEC 10 1996
SUPERFUND DIVISION

RE: Physical Characterization Technical Memorandum
Westlake Landfill Site
Operable Unit 2



40057489
SUPERFUND RECORDS

Dear Mr. Kinser:

The Missouri Department of Natural Resources' (DNR) Hazardous Waste Program, with support from the Division of Geology and Land Survey, has reviewed Golder Associates responses to comments provided by EPA and DNR on the subject document. In general, we are satisfied with the information presented in the aforementioned document and appreciate the changes made. However, we have two remaining concerns relating to the responses to comments 14 and 20:

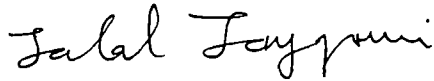
- 1) Data collected at the facility indicate that the groundwater in the St. Louis and Salem Formations is being recharged by surface water infiltration (see page 4-28, section 4.2.5). It is also stated that these units discharge water to the Missouri River alluvium west or northwest of the site (see page 5-4). This would indicate that it could be possible that water infiltrating the site west or northwest of the cone of depression, caused by leachate extraction in the active landfill, to migrate to the Missouri River alluvium, northwest of the site. If contaminants are detected in the Missouri River alluvium, it may be necessary to monitor groundwater in the bedrock beneath the alluvium to determine the amount of contaminants being discharged to the alluvium from the site via the groundwater in the bedrock aquifer.
- 2) In response to comment 20, it was indicated that groundwater quality data from existing wells and piezometers sampled by Operable Unit 1 (OU1) would provide site-wide groundwater quality information, when combined with the proposed Operable Unit 2 (OU2) sampling points. My understanding is that the major contaminants of concern at OU1 are radionuclides, and that not all samples were analyzed for the complete analyte list required for OU2. Since we have not had the benefit of reviewing the data generated by OU1 investigation, it is not possible to determine at this point if that data will be sufficient to provide the required site-wide information.

Mr. Steven Kinser
December 5, 1996
Page Two

If you have any questions regarding this letter or if I can be of any assistance to you, please feel free to contact me at (573) 751-3176. Thank you for the opportunity to review this document.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in cursive script, reading "Jalal El-Jayyousi".

Jalal El-Jayyousi
Environmental Engineer

JEJ:rw

c: Michael Siemens, DGLS